

# United States Department of the Interior

## NATIONAL PARK SERVICE

Olympic National Park

600 East Park Avenue

Port Angeles, Washington 98362-6798

IN REPLY REFER TO:

September 13, 2013

### Memorandum

To: Christine S. Lehnertz, NPS, Pacific West Regional Director

From: Karen F. Taylor-Goodrich, Superintendent, North Cascades National Park Complex *KFG*

Through: Stephen J. Mitchell, PE, NPS/PWR/FM, Operations/Environmental Program Lead *SM*

Subject: Engineering Evaluation & Cost Analysis Approval Memorandum for Proposed Non-Critical Removal Action at Stehekin and Newhalem Firing Ranges, North Cascades National Park Complex

#### I. Purpose

The purpose of this memorandum is to:

1. Request approval to proceed with an Engineering Evaluation & Cost Analysis (EE/CA) for a non-time-critical removal of lead impacted soils at the Stehekin and Newhalem Firing Ranges (Sites).
2. Document the situation meets the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) criteria for initiating a removal action and that the required removal action is non-time-critical; and
3. Provide a finding of an actual or threatened release from the site and, if present, a finding of an imminent and substantial endangerment, or refer to a document establishing such a determination.

The Non-Time-Critical Removal Action is being performed pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and the NCP. Under the CERCLA, the United States Department of Interior (DOI) National Park Service (NPS) has lead agency responsibility (40 CFR Part 300.5) for implementing appropriate investigations and removal actions where environmental impacts have or may have occurred from historical activities and where such releases may constitute a residual threat to human health or the environment.

#### II. Site Background

North Cascades National Park Complex was established in 1968 when administration of the land shifted from the United States Forest Service to the National Park Service (NPS). That land included two existing firing ranges (Sites), both with a history of agency and community use. The Sites are owned by the NPS and located as follows:

Stehekin: The Stehekin Site is located within Lake Chelan National Recreation Area in Chelan County, Washington, within North Cascades National Park Complex. The town of Stehekin lies at the head of

Lake Chelan, approximately 55 miles by boat from Chelan. The firing range is located approximately 7.5 miles from Stehekin Landing along the Stehekin Valley Road.

**Newhalem:** The Newhalem Site is located within Ross Lake National Recreation Area in Whatcom County, Washington, within North Cascades National Park Complex. The town of Newhalem is owned and operated by Seattle City Light to house the Skagit Hydroelectric Project workers. The firing range is located approximately 2000 feet northwest of the Skagit River (at river mile 92), at milepost 119 on the northwest side of Washington State Route 20.

### Site Investigation Results

In 2003, at the request of the NPS, Kleinfelder completed preliminary assessments (PAs) covering the Sites as follows:

- Preliminary Assessment of Two Sites, North Cascades NPS Complex, Stehekin, Washington, prepared by Kleinfelder, 2003a.
- Preliminary Assessment of Firing Range, North Cascades NPS Complex, Newhalem, Washington, prepared by Kleinfelder, 2003b.

These PAs identified and described past and present practices related to site use. The results of both assessments stated that existing data and information did not indicate a threat to human health, the surrounding environment, or local wildlife (Kleinfelder, 2003a and 2003b). However, information collected for PAs was limited to site visits and interviews. Collection of soil samples from the Sites and analysis of lead concentrations was not completed as part of the PAs, and the Sites have been actively used since completion of the PAs.

### **III. Threat to Public Health, Welfare, or the Environment**

Lead may be present at the Sites in quantities that present a risk to public health, welfare, or the environment. Releases from the Sites will be determined based on exceedance of the following criteria:

- For human receptors, State of Washington Model Toxics Control Act (MTCA, 173-340 WAC) Method A regulatory cleanup levels will be used for determining threat levels.
- For ecological receptors, State of Washington Model Toxics Control Act (MTCA, 173-340 WAC) Method A regulatory cleanup levels will be used to assess threat levels.

Potential threats to human health and the environment are as follows:

- Lead in soils. The source of lead is due to use of the Sites as small arms firing ranges.

### **IV. Imminent and Substantial Endangerment (Statutory Basis for Action)**

Section 300.415(b)(2) of the National Contingency Plan (NCP) provides factors for determining the appropriateness of a removal action. The factors applicable to current conditions at the Sites include actual or potential exposures to nearby human populations, animals, or the food chain from hazardous substances or pollutants (lead).

In accordance with 300.415(b)(4) of the NCP, the NPS has determined that a planning period of at least six months exists before on-site activities must be initiated; therefore, an EE/CA must be conducted to identify and evaluate removal action alternatives to recommend a Non-Time-Critical Removal Action (NTCRA) that best meets the evaluation criteria.

**V. Enforcement Actions**

There are currently no Enforcement Actions occurring for the Sites.

**VI. Public Involvement**

NPS expects to issue an EE/CA for public comment in 2014.

**VII. Proposed Project Oversight and Cost**

The EE/CA will be conducted by a contractor working for the NPS. The objectives of the EE/CA include the following:

- Characterize the nature and extent of lead contamination at the Sites,
- Assess any potential risks to human health and the environment,
- Identify Applicable or Relevant and Appropriate Requirements (ARARs) under the CERCLA, and
- Evaluate any needed response actions consistent with the NCP and CERCLA.

The cost of the EE/CA contract is \$79,800.00. The NPS will be conducting project oversight. The cost of the Removal Action will be assessed during the EE/CA.

**VIII. Approval/Disapproval**

The conditions at the Stehekin and Newhalem Firing Ranges meet the NCP criteria for a Removal Action. Based upon the information and analysis presented in this memorandum, please indicate your concurrence or non-concurrence with the recommendation to perform an EE/CA as part of a NTCRA at the lead contaminated sites identified herein and located within North Cascades National Park Complex.

Approve: \_\_\_\_\_

  
Christine S. Lehnertz  
National Park Service  
Director, Pacific West Region

09/20/2013  
Date

Disapprove: \_\_\_\_\_

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Christine S. Lehnertz  
National Park Service  
Director, Pacific West Region

Date

#### **References**

Kleinfelder, 2003a, Preliminary Assessment of Two Sites, North Cascades NPS Complex, Stehekin, Washington.

Kleinfelder, 2003b, Preliminary Assessment of Firing Range, North Cascades NPS Complex, Newhalem, Washington.